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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ORACLE USA, INC.; a Colorado corporation;  
 ORACLE AMERICA, INC.; a Delaware  
 corporation; and ORACLE INTERNATIONAL  
 CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada corporation;  
 and SETH RAVIN, an individual,

Defendants.

**Case No. 2:10-cv-0106-LRH-VCF**

**[PROPOSED] ORDER GRANTING  
 ORACLE'S MOTION TO COMPEL  
 RE POST-INJUNCTION  
 REQUESTS FOR PRODUCTION**

**[PROPOSED] ORDER**

Pending before this Court is Plaintiffs Oracle USA, Inc., Oracle America, Inc., and Oracle International Corporation's (collectively "Oracle") Motion to Compel and Memorandum of Points and Authorities re Post-Injunction Requests for Production ("Motion"). Having considered Oracle's Motion, and good cause existing:

**IT IS HEREBY ORDERED THAT:**

Oracle's Motion is GRANTED. Rimini shall produce all non-privileged custodial and non-custodial documents requested by Oracle's Supplemental RFPs 1–5, 8–11, and 13 on a rolling basis according to the following schedule:

Rimini shall complete three custodial productions per week beginning the week of September 2–6, 2019, increasing to completion of four custodial productions per week beginning the week of September 23–27, 2019. Rimini shall complete production for thirteen custodians by September 27, 2019. Rimini shall complete custodial production for the remaining six custodians by October 11, 2019.

Any documents withheld on the basis of privilege shall be logged. Rimini shall complete all non-custodial and custodial production in response to any additional requests for production within 30 days of service of the requests.

Rimini's custodial production of non-privileged documents requested by RFPs 1–5, 8–11, and 13 and any additional requests for production shall result from a search of the following nineteen custodians: Seth Ravin, Nancy Lyskawa, Sebastian Grady, Jim Benge, Ron Teegarden, Tim Conley, Michael Jacob, David Miller, Don Sheffield, Kaitland Conley, Brenda Davenport, Richard Frank, Manjula Hosalli, Ray Grigsby, Sai Sharma, Susan Tahtaras, Gary Tidwell, Kevin Wood, and the lead developer for PeopleSoft updates delivered between December 2018 and February 2019 (as identified by Rimini).

Rimini's search of custodial documents for production in response to Oracle's Supplemental RFPs 1–5, 8–11, and 13 and any additional requests for production shall be performed using the following search terms:

Topic	Boolean search terms
Injunction	Injun*, enjoin*
Automated Framework	AFW*, Automat*, Frame*, rsiRequest*, rsiReturn*, UpdateSelf*, Gen Diff*, GenDiff*, Apply Diff*, ApplyDiff*, GenApply*, Gen Apply*, ApplyUpdate*, Change set*, <u>diff</u> , <u>diffs</u> , k-diff*, hash*, rehash*, push*, SendClientFiles*, Send Client Files, ReturnClientFiles*, Return Client Files*, <u>__done__</u> .txt, <u>__done_x</u> .txt, *WriteLogDT*, GenHash, Gen Hash*, JobNbr, Job Number*, GenDataChanges*, CreateUpdate*, Create Update*, CopyFromAnotherUpdate*, Copy From Another Update*, VerifySourceFiles*, Verify Source Files*, Delete Client Files*, DeleteClientFiles*, CodeAfter*, Code After*, Code_After*CodeBefore*, Code Before*, Code_Before*, SourceClient*, Source Client*, many to many, one to many, *rsiarc
DevReview	DevRev*, Dev Rev*, Development Rev*, DevelopmentRev*, RSIDVRVW*
Copy-paste-delete	Copy*, paste*, copy paste*, copy-paste*, cypypaste*, copie*, cut*, cut paste*, clone, <u>delet</u> *
FTP	FTP*, FromRSI*, ToRSI*, scp*, winscp*, putty*, Filezilla*, File Transfer*, FileTransfer*, TransferFile*, Transfer File*, ClientFTP*, VerifyDocProcess*, Verify Doc Process*, PackageVerify*, Package Verify*, RSIPackageVerify*, RSI Package Verify*
Other Distribution	Manual*, short test, long test, run to success, internal.rsi*, departmentshare*, *dfs*, CodeAnalyz*, code analyz*, GPD*, replicat*
PeopleSoft	PeopleSoft*, PSoft*, Pplsoft*, PeopleCode*, PeopleTools*, Psft*, ps_home*, Application Designer, App Designer
JD Edwards	JDE*, JD Edward*, J.D.E*, J.D. Edward*, source code*, source code object*, JDE World, OneWorld, WorldVision, Event Rule*, Named Event Rule, EnterpriseOne*, Enterprise One*, E1, OMW, Object Management Workbench*, pristine, deploy*, 5250, Electronic Software Update*, ESU, AS/400, as400, code member*, Batch Application*, UBE, BSFN, Business Function*, APPL, Interactive Application, Package Build, Development Client, visual studio, visual compiler, visual c++ compiler
Oracle	Oracle* and legal* , Oracle* and infringing* , Oracle* and copyright* , Oracle* and lawsuit* , Oracle* and liab*, MOS*, MyOracle*
Updates	Tax* and not SAP, <u>Reg</u> , <u>Regs</u> , <u>regu</u> *, rs19*, j??f, j??p, p??f, p??p, T&R*, T & R*, ACA, 1099*, HCM*, FSCM*, HRMS*, Payroll*, Year-end*, Year end*, <u>updat</u> *, *sqr, *sql, *sqc, *xml, *cbl, *dms, *.log, *vbs, *.cs, *.h, *.c, *obj, Devtrack*, Jira*, WebCM*, <u>mod</u> , <u>modif</u> *, roll-up*, roll up*, rollup*, bundle*, QA, Quality Assur*, *58a*, patch*, <u>update</u> *, TLR, DevInstrction*, Dev-Instruction*, Dev_Instruction*, Dev

Topic	Boolean search terms
	Instruction*
Environments	Env* and not SAP, break-fix*, break fix*, development and not SAP, dev, test, prod, production, smartsheet*, smart-sheet*, smart sheet*, Ticket*
Remote Hosting	<u>Local</u> *, remote*, TierPoint* Tier Point*, Windstream*, WSM*, AWS*, Amazon*, Azure*, VM*, virtual machine*, vmware*
Development	Proto*, <u>build</u> , <u>builds</u> , promot*, cross-us*, cross us*, retrofit*, apply-only*, apply only*, ApplyOnly*, Func* w/2 spec*, func_*, *_func*, Tech* w/2 spec*, TechSpec, Tech-spec, *_tech*, tech_*, UnitTest*, Unit_test* Unit Test*, beta*, TUSS*, salesforce*, sales force*, agent ransack*, MSTSC, ShareFile, sharepoint, share point, screenshot, snagit, ultraedit, compil*, toad
Policies and marketing	Polic*, whitepaper*, white paper*, white-paper*, security@riministreet.com, complian*, violat*, order, court, appeal, ISO, ISO9001*, webinar*, brochure*, success stor*, datasheet*, ebook*, infographic*, podcast*, Section 502*, deriva*, license*, benefit* and software, benefit* and copy*, infrin*

## Notes:

Topics are provided for ease of reference only.

Underlined search terms are to be omitted for executive custodians (Grady, Lyskawa, Ravin).

“?” is intended to be a single-character wildcard, such that “j??f” would capture “JUSF” and “JCAF” but not “jollof.”

IT IS SO ORDERED.

DATED: \_\_\_\_\_

\_\_\_\_\_  
Cam Ferenbach  
United States Magistrate Judge